

1 Scott E. Gizer, Esq., Nevada Bar No. 12216
2 *sgizer@earlysullivan.com*
3 Sophia S. Lau, Esq., Nevada Bar No. 13365
4 *slau@earlysullivan.com*
5 EARLY SULLIVAN WRIGHT
6 GIZER & McRAE LLP
7 8716 Spanish Ridge Avenue, Suite 105
8 Las Vegas, Nevada 89148
9 Telephone: (702) 331-7593
10 Facsimile: (702) 331-1652

11 Kevin S. Sinclair, State Bar Number 12277
12 *ksinclair@sinclairbraun.com*
13 SINCLAIR BRAUN LLP
14 16501 Ventura Blvd, Suite 400
15 Encino, California 91436
16 Telephone: (213) 429-6100
17 Facsimile: (213) 429-6101

18 Attorneys for Defendants
19 FIDELITY NATIONAL TITLE INSURANCE COMPANY and
20 FIDELITY NATIONAL TITLE GROUP, INC.

21 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
22 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

23 Gary L. Compton, State Bar No. 1652
24 2950 E. Flamingo Road, Suite L
25 Las Vegas, Nevada 89121

26 **UNITED STATES DISTRICT COURT**

27 **DISTRICT OF NEVADA**

28 WELLS FARGO BANK, N.A.,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,
INC. et al.,

Defendants.

Case No.: 2:20-CV-02155-RFB-BNW

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COMPLAINT (ECF No. 1)**

(FIRST REQUEST)

COMES NOW defendants Fidelity National Title Insurance Company (“Fidelity”) and Fidelity National Title Group, Inc. (“FNTG”) and plaintiff Wells Fargo Bank N.A. (“Wells Fargo”), by and through their respective attorneys of record, which hereby agree and stipulate as follows:

1 1. On December 1, 2020, Wells Fargo filed its complaint in the Eighth Judicial
2 District Court for the State of Nevada;

3 2. On December 1, 2020, Fidelity removed the instant case to the United States
4 District Court for the State of Nevada (ECF No. 1);

5 3. On December 7, 2020, Wells Fargo served its complaint on Fidelity;

6 4. Fidelity's response to the complaint is currently due on December 28, 2020;

7 5. On December 14, 2020, Wells Fargo served its complaint on FNTG;

8 6. FNTG's response to the complaint is currently due on January 4, 2021;

9 7. Defendants request an extension until Wednesday, January 27, 2021 to respond to
10 Wells Fargo's complaint to afford Defendants' counsel additional time to review and respond to
11 Wells Fargo's complaint.

12 8. Counsel for Wells Fargo does not oppose the requested extension;

13 9. This is the first request for an extension made by Defendants, which is made in
14 good faith and not for the purposes of delay.

15 10. This stipulation is entered into without waiving any of Defendants' objections
16 under Fed. R. Civ. P. 12.

17 //

18 //

19 //

20 //

21 //

22 //

23 //

24 //

25 //

26 //

27 //

28 //

1 **IT IS SO STIPULATED** that Defendants' deadline to respond to the complaint is hereby
2 extended through and including January 27, 2021.

3 Dated: December 16, 2020

SINCLAIR BRAUN LLP

4
5 By: /s/-Kevin S. Sinclair

6 KEVIN S. SINCLAIR

Attorneys for Defendants

7 FIDELITY NATIONAL TITLE INSURANCE

COMPANY and FIDELITY NATIONAL

8 TITLE GROUP, INC.

9 Dated: December 16, 2020

WRIGHT FINLAY & ZAK, LLP

10
11 By: /s/-Lindsay D. Robbins

12 LINDSAY D. ROBBINS

Attorneys for Plaintiff

13 WELLS FARGO BANK, N.A.

14 ORDER

15 **IT IS SO ORDERED**

16 **DATED:** 4:36 pm, December 22, 2020

17 

18 **BRENDA WEKSLER**

19 **UNITED STATES MAGISTRATE JUDGE**